

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

AMPEX CORPORATION,)
)
)
)
 Plaintiff,)
)
)
 v.) C.A. No. 04-1373 (KAJ)
)
)
EASTMAN KODAK COMPANY,)
ALTEK CORPORATION, and)
CHINON INDUSTRIES, INC.,)
)
 Defendants.)
)

NOTICE OF DEPOSITION OF MANABU KIRI

Please take notice that Plaintiff Ampex Corporation (“Ampex”) will take the deposition upon oral examination of Manabu Kiri, pursuant to Rule 30 of the Federal Rules of Civil Procedure. The deposition will be held at the American Consulate General Osaka-Kobe, Osaka-Kobe 2-11-5 Nishitenma, Kita-ku, Osaka 530-8543 Japan commencing on or about January 20, 2006, at 9:00 a.m. or at such other date, time and place as mutually agreed upon by counsel, and continuing from day to day until completed.

This examination will be taken before a Notary Public or other person authorized to administer oaths and will be recorded stenographically and/or by video and shall continue from day to day until completed. Testimony derived pursuant to this Notice of Deposition shall be used for any and all appropriate purposes permitted by the Federal Rules of Civil Procedure.

You are invited to attend.

MORRIS, NICHOLS, ARSHT & TUNNELL

/s/ Jack B. Blumenfeld (#1014)

Jack B. Blumenfeld (#1014)
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November 23, 2005

CERTIFICATE OF SERVICE

I, Jack B. Blumenfeld, hereby certify that on November 23, 2005, I caused to be electronically filed Notice of Deposition of Manabu Kiri with the Clerk of the Court using CM/ECF, which will send notification of such filing(s) to the following:

Paul M. Lukoff
David E. Brand
Prickett, Jones, Elliott, P.A.

and that I caused copies to be served upon the following in the manner indicated:

BY HAND

Paul M. Lukoff
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1310 King Street
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BY FEDERAL EXPRESS

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/s/ Jack B. Blumenfeld (#1014)
Jack B. Blumenfeld